

FILED

2018 AUG 15 PM 4:10

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL P. TRICASO, D.O.,

Defendant.

) CASE NO.:

)
)
) 5:18 CV 1891
)

) MOTION FOR LEAVE TO FILE


) COMPLAINT UNDER SEAL
)

The United States of America, through its undersigned counsel, respectfully requests leave to file under seal the attached Complaint, Motion for a Temporary Restraining Order and Preliminary Injunction, Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunction, Proposed Temporary Restraining Order, and Affidavit of Hauns Charters, with Exhibits. The United States is engaged in parallel civil and criminal investigations of Defendant Michael P. Tricaso, D.O., with execution of search warrants planned for August 21, 2018. In order to prevent the destruction of evidence prior to the execution of the search warrants, the United States requests that the seal remain in place only until the search warrants can be executed.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

CHAD A. READLER
Acting Assistant Attorney General
United States Department of Justice
Civil Division

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